

**ENVIRONMENTAL PROTECTION AGENCY**  
**POLLUTION REPORT**

10300493



**DATE:** November 23, 1992

**FROM:** Robert N. Rosen, OSC, U.S. EPA Region IV, *RNR*  
Emergency Response and Removal Branch

**TO:** D. Lair, EPA  
M. Norman, EPA  
D. Dietrich, EPA HQ  
V. Antoniadis, EPA HQ  
E. Davis, EPA ORC  
M. Henderson, EPA  
S. Mabry, MSDEQ  
TAT

**SUBJECT:** Enterprise Recovery Systems, Byhalia, Marshall  
County, Mississippi

**POLREP NO.:** One (1)

**I. BACKGROUND**

Site No.: 0Q  
Delivery Order No.: 4005-F4-015  
Response Authority: CERCLA  
NPL Status: Non-NPL  
Start Date: 10/28/92

**II. INCIDENT INFORMATION**

**A. Incident Category**

CERCLA Incident Category: Inactive Solvent Recycler

**B. Situation**

**1. Site description**

Enterprise Recovery Systems is an inactive solvent recycling and fuels blending facility in Marshall County in northwestern Mississippi. The site is located midway between Byhalia, Mississippi and Collierville, Tennessee on rural Cayce Road, which runs north-south between U.S. Highways 72 and 78. The eight-acre site is surrounded by farms and fields, with a residential population less than 500 within a one-half mile radius of the site. However, the majority of the homes are located within 200 yards of the site.

Nonconnah Creek headwaters flow alongside the property's northern and eastern boundaries and the site is within the recharge area for the Kosciusko Aquifer.



Enterprise had been in the solvent recycling business as a RCRA-permitted facility since 1984, and had conducted related business activities as early as 1978. Enterprise ceased operations in October, 1991, when their insurer canceled insurance coverage after significant soil and groundwater contamination was found at the site. The action by the insurer coincided with an ongoing investigation by the Mississippi State Department of Environmental Quality (DEQ). Acting on a history of fires and releases at the facility, DEQ had initiated an assessment of soil and groundwater contamination at the site and groundwater contamination of adjacent residential wells.

### **C. Preliminary Assessment Results**

A Preliminary Assessment was conducted by EPA on September 9 and 10, 1992. The primary intent was to document DEQ's earlier findings of residential well contamination at homes adjacent to the site. Ten homes were selected for sampling. Samples were collected and submitted to private laboratories for analysis of levels of volatile organic compounds (VOCs), metals, PCB, and pesticides. Results confirmed earlier findings that three homes have VOCs, such as trichloroethylene, at levels as high as 100 parts per billion.

In addition to water sampling, EPA inventoried drums and tanks on site and conducted random field analysis (hazcat) of 10% of the drums on site (15 hazcat/150 drums). Hazcat results indicated that some of the drums contained flammable and combustible materials. Drum labels identified contents as D001, F001 and F003 materials, indicating spent halogenated and non-halogenated solvents, which are listed hazardous wastes. Further, aboveground tanks presently store as much as 65,000 gallons of 1,1,1-trichloroethane and waste trichloroethylene.

An immediate threat to public health, welfare and the environment was clearly established by the levels of contaminants found in the residential wells, and in the soils and groundwater on site (DEQ investigation results). A strong potential for continued release exists due to the number of deteriorated drums and storage tanks containing hazardous substances which have essentially been abandoned since October, 1991. Additionally, product from one of the tanks had leaked into the containment area and through dike walls onto adjacent soil.

This site was referred to the Site Assessment Section (SAS) for a Hazard Ranking System (HRS) rating. SAS has advised the OSC on their media sampling requirements for carrying



out a hazard ranking. These requirements will be incorporated into removal action sampling and evaluation.

### III. RESPONSE INFORMATION

#### A. Planned Removal Action

An Action Memorandum has been approved which details work to be conducted at the site. Work will be conducted in phases: stabilization, sampling and analysis of drums and tanks, sampling and analysis of surface soils, transportation and disposal of drum and tanks wastes, disposal of soil as required, and provision of drinking water to the affected residents.

#### B. Status of Actions

##### 1. Removal actions to date

On October 28, 1992, OSC met with ERCS personnel at site to conduct site visit. ERCS was requested to develop a draft work plan for the first phase of work, scheduled to begin on November 9, 1992. ERCS also initiated water delivery to the three affected households at this time.

On November 9, 1992, ERCS, TAT and EPA mobilized to the site for the first phase of the removal. The following activities were conducted: inventory and number all drums and tanks (218 drums, 34 tanks); overpack drums as needed; pump oily solvent from the containment area into an empty tank; collect samples from all tanks and drums for analysis; collect soil samples for analysis.

The results of the residential well sampling have been shared with the residents. Those residents whose wells are unaffected were notified by mail. Residents with contaminated wells were visited by the OSC and the results of the analysis were explained. ERCS will continue to provide water to the affected residents until other options are evaluated.

On November 20, 1992, ERCS demobilized from the site and is not expected to resume removal activities until the middle of January, 1993.

##### 2. Enforcement

The EPA Office of Regional Counsel (ORC) has assigned an attorney to this site. A CERCLA 104(e) information request letter was sent to the facility owner, requesting information on companies which have sent



waste to the site. The facility owner appears to be unwilling and financially unable to conduct a cleanup. However, based on the information ORC has already received from the owner, other Potentially Responsible Parties (PRPs) are being identified and will be notified.

An access agreement has been submitted to the attorney for the facility owner. The agreement requests that the owner cease any and all site activities and refrain from visiting the site until the removal action has been completed. This request was made because additional drums had been moved to the facility in between the October site visit and commencement of the removal action in November.

#### C. Next Steps

ERCS will conduct field analysis of the collected drum and tank samples. The results will allow samples to be bulked into compatible waste groups and representative samples submitted for disposal analysis. Those analytical results will be used to evaluate disposal options. The results of soil sampling will be used to determine whether this removal action will have to address soil contamination.

#### IV. COST INFORMATION

A.	Total Project Ceiling Authorized	\$673,000
B.	Total Funds Authorized for Mitigation Contracts	500,000
C.	Expenditures for Mitigation Contract	
	1. Amount obligated to DCN #DH0154	500,000
	2. Estimated expenditures as of 11/20/92	41,700
	3. Balance remaining	480,000
	4. Percentage remaining	91%
D.	Unobligated Balance Remaining	-0-
E.	Other Extramural Costs	
	1. TAT salary/travel	3,000
F.	Intramural Removal Costs	
	1. EPA travel and salaries	2,500
G.	Total Expenditures	47,200
	Percent of Total Project Ceiling	9.5%



Distribution:

V. Antonaides EPA HQ E-Mail: none  
Bldg code: WSM Room #: M2616 Mail code: OS-210

D. Dietrich EPA HQ E-Mail: OSWER, OERR, OD  
Bldg code: WSM Room #: M2710 Mail code: OS-210

Lair, Norman, Henderson - EPA Region IV ERRB

E. Davis - EPA ORC GA/AL/MS Section 12th floor Tower Bldg

Sam Mabry  
Jim Tillman  
Mississippi Department of Environmental Quality  
Office of Pollution Control  
P.O. Box 10385  
Jackson, Mississippi 39289-0385

*FAX 601-354-6612*